

*United States Attorney
Southern District of New York*

December 17, 2021

BY ECF

Honorable Jesse M. Furman
United States District Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

**Re: *United States v. Joshua Adam Schulte*,
S3 17 Cr. 548 (JMF)**

Dear Judge Furman:

The Government respectfully submits the attached proposed modifications to the Classified Information Procedures Act (“CIPA”) protective order in this matter (D.E. 61). The Court’s order directed that proposed modifications be filed by noon today (D.E. 637), and the Government apologizes for the late submission and respectfully requests that the Court accept the late filing. The proposed modifications principally reflect that former defense counsel is now standby counsel and clarifies the responsibilities of standby counsel. In addition to the CIPA protective order, there is also a supplemental CIPA protective order (D.E. 75) which principally governs the defendant’s visits to the Sensitive Compartmented Information Facility (“SCIF”), and which already has been modified as appropriate by other orders of the Court. (*See, e.g.*, 575).

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

by: /s/
David W. Denton, Jr. / Michael D. Lockard
Assistant United States Attorneys
(212) 637-2744 / -2193

cc: Standby counsel (by ECF)
Joshua Adam Schulte (by mail)